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September 14, 2015

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By Hand and ECF

The Honorable Paul A. Engelmayer
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007-1312

Re: *Inter-American Development Bank v. Venti, S.A.*, 1:15-cv-04063-PAE

Dear Judge Engelmayer:

We represent Plaintiff Inter-American Development Bank (the "IDB") in the above-referenced matter. The IDB initiated this action to enforce two unconditional loan guarantees executed by Defendants Venti, S.A. ("Venti") and Industrias Metalúrgicas Pescarmona S.A.I.C. y F. ("IMPESA," and collectively "Defendants").

On July 20, 2015, the parties appeared before this Court for a preliminary conference. At the conference, the parties agreed to a schedule for discovery and summary judgment briefing. This schedule was memorialized in the Court's order entered on July 21, 2015. *See* Dkt No. 22.

Pursuant to this scheduling order, the IDB filed its motion for summary judgment on August 28, 2015 after the close of fact discovery. Defendants' opposition was due last Friday, September 11, 2015. Defendants, however, did not file an opposition. We contacted counsel for Defendants to ask whether Defendants intended to file an opposition, and they confirmed that Defendants will not be opposing the motion. Attached hereto as Exhibit A is a September 12, 2015 email from Kelly Robreno Koster, counsel for Defendants, to that effect.


The IDB respectfully requests that the Court immediately grant the motion for summary judgment and enter judgment in the full amount requested. The IDB is preparing a supplemental schedule to calculate additional interest and late fees that have accrued subsequent to the filing of the IDB's motion for summary judgment. The IDB expects to be able to submit that schedule tomorrow.

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A courtesy copy of the IDB's motion papers are enclosed herewith.

Respectfully submitted,


David Daniels

cc: Steven R. Kramer, Esq. (via ECF and email)